1	NICHOLAS J. SANTORO, ESQ. Nevada Bar No. 00532		
2	JAMES D. BOYLE, ESQ. Nevada Bar No. 08384		
3	SANTORO, DRIGGS, WALCH, KEARNEY, HOLLEY & THOMPSON		
4	400 South Fourth Street, Third Floor Las Vegas, Nevada 89101		
5	Telephone: 702/791-0308 Facsimile: 702/791-1912		
6	JAMES P. FOGELMAN, ESQ.		
7	Nevada Bar No. 09803 GIBSON, DUNN & CRUTCHER LLP		
8	333 South Grand Avenue Los Angeles, California 90072-3197		
9	Telephone: 213-229-7000 Facsimile: 213-229-7520		
10	Attorneys for Caesars License Company, LLC and		
	Caesars Interactive Entertainment, Inc.		
12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14	ULTRA INTERNET MEDIA, S.A., a company organized under the laws of Nevis, West Indies;	Consolidated Base Case File No.: 2:10-cv- 00455-JCM-RJJ	
15	GIGAMEDIA LIMITED, a company organized	(consolidated with Case No.: 2:10-cv-00607-	
16	under the laws of the Republic of China (Taiwan); EVEREST GAMING LIMITED, a	ĴCM-RJJ)	
17	company organized under the laws of the Republic of Malta, MANGAS GAMING SAS,	(consolidated w/ Case No.: 2:10-cv-00904- JCM-LRL)	
18	a company organized under the laws of the Republic of France; MANGAS EVEREST		
19	SAS, a company organized under the laws of	JOINT NOTICE OF DISMISSAL OF ALL CONSOLIDATED MATTERS	
20	the Republic of France; and DOES 1-10,	PURSUANT TO FED. R. CIV. P. 41(a)	
21	Plaintiff/Counter-Defendants,		
22	V.		
23	CAESARS LICENSE COMPANY, LLC, a		
24	Nevada limited liability company; and CAESARS INTERACTIVE		
25	ENTERTAINMENT, INC., a Delaware corporation,		
26	Defendants/Counterclaimants.		
27			
28			

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1	EVEREST GAMING LIMITED, a company			
2	organized under the laws of the Republic of Malta,			
3	Plaintiff,			
4	v.			
5	CAESARS INTERACTIVE			
6	ENTERTAINMENT, INC., a Delaware Corporation; and CAESARS LICENSE			
7	COMPANY, LLC, a Nevada Limited Liability			
8	Company,			
9	Defendants.			

License Company, LLC and Caesars Interactive Entertainment, Inc. (collectively, "Caesars"), by and through their undersigned counsel of record, and Ultra Internet Media, S.A. ("UIM"), Everest Gaming Limited ("Everest"), GigaMedia Ltd. ("GigaMedia"), Mangas Everest, SAS ("Mangas Everest") and Mangas Gaming, SAS ("Mangas Gaming"), by and through their undersigned counsel of record, hereby submit this Joint Notice of Voluntary Dismissal of All Consolidated Matters Pursuant to Fed. R. Civ. P. 41(a) (the "Notice").

Specifically, Caesars, UIM, Everest, GigaMedia, Mangas Everest and Mangas Gaming hereby jointly stipulate and agree as follows:

- 1. UIM hereby dismisses each and every one of its claims against Caesars WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ;
- 2. Caesars hereby dismisses each and every one of its counterclaims against UIM WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ;
- 3. Caesars hereby dismisses each and every one of its counterclaims against GigaMedia WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10cv-00455-JCM-RJJ;
- 4. Caesars hereby dismisses each and every one of its counterclaims against Mangas Everest WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ;

## OBase 22: 100-2-100964-000M-PRJJJ Doccument 2364 FFFeld 008/88/11 PRgg & 3066

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

//

//

//

//

//

//

//

//

//

//

//

//

//

5.	Caesars hereby dismisses each and every one of its counterclaims against Ma	
	Gaming WITH PREJUDICE, as alleged in Consolidated Base Case No. 2:10-cv-	
	00455-JCM-RJJ;	

- 6. Caesars hereby dismisses each and every one of its claims against UIM WITH PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ;
- 7. UIM hereby dismisses each and every one of its counterclaims against Caesars WITH PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ; and
- 8. Everest hereby dismisses each and every one of its claims against Caesars WITH PREJUDICE, as alleged in Consolidated Case No. 2:10-cv-00904-JCM-LRL.
- 9. Each of the parties shall pay all of its own legal fees, costs, and any other expenses incurred or to be incurred in connection with the litigation.

In light of the foregoing dismissals, the Parties further stipulate and agree to vacate the hearing scheduled for August 25, 2011 regarding pending motions for summary judgment and motions for partial summary judgment (<u>see</u> Docket No. 280).

1	Dated this / day of August, 2011.	
2	MARQUIS & AURBACH	SANTORO, DRIGGS, WALCH, KEARNEY, HOLLEY & THOMPSON
3	By: Jay Many	By: /s/ James D. Boyle
4	JAY YOUNG ESQ.	NICHOLAS J. SANTORO, ESQ.
5	Nevada Bar No. 05562 DAVID T. DUNCAN, ESQ.	Nevada Bar No. 00532 JAMES D. BOYLE, ESQ.
5	Nevada Bar No. 09546	Nevada Bar No. 08384
6	10001 Park Run Drive Las Vegas, Nevada 89145	400 S. Fourth Street, Third Floor Las Vegas, Nevada 89101
7		•
8	Attorneys for Ultra Internet Media, S.A., GigaMedia Limited, and Everest Gaming	GIBSON, DUNN & CRUTCHER LLP
0	Limited	JAMES P. FOGELMAN, ESQ.
9	FIT7DATDICK CELLA HADDED &	Nevada Bar No. 09803 SHANNON E. MADER, ESQ.
10	FITZPATRICK, CELLA, HARPER & SCINTO	California Bar No. 235271
	TIN COTING I WELLY EGO	Admitted Pro Hac Vice
11	TIMOTHY J. KELLY, ESQ. RALPH A. DENGLER, ESQ.	333 South Grand Avenue Los Angeles, California 90072-3197
12	Admitted Pro Hac Vice	•
13	1290 Avenue of the Americas New York, New York 10104-3800	Attorneys for Caesars Interactive Entertainment, Inc., and
	ŕ	Caesars License Company, LLC
14	Attorneys for Everest Gaming Limited	
15		
16	HOWARD & HOWARD ATTORNEYS, PLLC	
17		
	By: /s/ Robert L. Rosenthal, Esq. ROBERT L. ROSENTHAL, ESQ.	
18	Nevada Bar No. 06476	
19	3800 Howard Hughes Parkway Suite 1400	
20	Las Vegas, Nevada 89169	
21	Attorneys for Mangas Everest SAS and Mangas Gaming SAS	
22	arangus cummg arra	
23	///	
24	///	
25	///	
26	///	
27	///	
	·	
28		

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

## **ORDER**

Pursuant to the stipulation and agreement of counsel for Caesars Interactive Entertainment, Inc., and Caesars License Company, LLC, counsel for Ultra Internet Media, S.A. ("UIM"), GigaMedia Limited ("GigaMedia"), and Everest Gaming Limited ("Everest Gaming"), and counsel for Mangas Everest SAS ("Mangas Everest") and Mangas Gaming SAS ("Mangas Gaming") as set forth above, the Court hereby ORDERS and DECREES as follows:

- UIM's claims against Caesars, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- Caesars' counterclaims against UIM, as alleged in Consolidated Base Case No.
   2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 3. Caesars' counterclaims against GigaMedia, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 4. Caesars' counterclaims against Mangas Everest, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 5. Caesars' counterclaims against Mangas Gaming, as alleged in Consolidated Base Case No. 2:10-cv-00455-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 6. Caesars' claims against UIM, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 7. UIM's counterclaims against Caesars, as alleged in Consolidated Case No. 2:10-cv-00607-JCM-RJJ, are hereby dismissed WITH PREJUDICE;
- 8. Everest's claims against Caesars, as alleged in Consolidated Case No. 2:10-cv-00904-JCM-LRL, are hereby dismissed WITH PREJUDICE; and
- 9. In light of the foregoing dismissals, the Court hereby VACATES the hearing scheduled for August 25, 2011 regarding pending motions for summary judgment and motions for partial summary judgment (*see* Docket No. 280).

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE DATED August 18, 2011

//

//

28

## Qase22:00:0000964JOOMHRJJJ Doocumeentt2994 FFFeld0088/88/11 PRgge660666

## SANTORO, DRIGGS, WALCH, (EARNEY, HOLLEY & THOMPSON

SA
S

.